

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

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|-------------------------------------|---|---|
| FORTRESS VALUE RECOVERY FUND I, LLC |) | Case No. 1:11-CV-00200 |
| |) | |
| |) | JUDGE JAMES S. GWIN |
| Plaintiff, |) | |
| |) | MAGISTRATE JUDGE WILLIAM H. |
| v. |) | BAUGHMAN |
| |) | |
| COLUMBUS COMPONENTS GROUP, LLC, |) | <u>SECOND UNOPPOSED MOTION OF</u> |
| et al. |) | <u>DEFENDANTS TO EXTEND EXPERT</u> |
| |) | <u>IDENTIFICATION DEADLINE</u> |
| Defendants. |) | |

Now come Defendants, Columbus Components Group, LLC, CCG Holdings, LLC, PJ Management Group, LLC, Hawthorn Manufacturing Corporation and Patrick James (collectively the "Defendants"), by and through undersigned counsel, and hereby move this Court for another brief, two-week extension of the June 15, 2011 deadline for Defendants to identify their expert witnesses (the "Expert Identification Deadline"). (*See* Doc. No. 48) The purpose of this second extension request will afford the parties necessary time to complete their discussion relating to the dismissal of this lawsuit. More importantly, the instant extension request is unopposed by Plaintiff, Fortress Value Recovery Fund I, LLC ("Plaintiff").¹ While the Parties have been finalizing the dismissal of this case, an additional two weeks is needed to complete the discussion.

Moreover, this brief extension of time would not have an effect on the current Case Management Schedule, including the trial scheduled on a two-week standby period beginning on November 7, 2011. (*See* Doc. No. 40). Therefore, this unopposed motion to extend Defendants' Expert Identification Deadline by two-weeks will neither delay the administration of this case,

¹ The Plaintiff and Defendants are hereinafter defined as the "Parties."

nor prejudice the Parties. Counsel for Defendants will certainly make themselves available should the Court wish to inquire further on the propriety of this extension request.

For the foregoing reasons, Defendants respectfully request this Court extend their current Expert Identification Deadline from June 15, 2011 to June 29, 2011. A proposed Order is attached hereto for the Court's convenience.

Respectfully submitted,

/s/ Pete C. Elliott

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of June, 2011, a true and complete copy of the foregoing was filed electronically. Service on all the parties of record will be made through the Court's Electronic Filing System. The parties may access this filing through the Court's Electronic Filing System.

/s/ Pete C. Elliott
*One of the Attorneys for Defendant Hawthorn
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